

COUNTY OF MARIN ENVIRONMENTAL HEALTH SERVICES

SAFE DRUG DISPOSAL

STEWARDSHIP PLAN

PROPOSAL

January 21, 2021

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SUBMITTED BY:



INMAR
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I. Introduction

Inmar submits this Stewardship Plan (“Plan”) for Unwanted Covered Drugs in compliance with the Marin County Safe Drug Disposal Ordinance, Marin County Code Chapter 7.90.010 – 7.90.160 (“Ordinance”). All capitalized terms not otherwise defined shall have the same meaning as in the Ordinance.

The Stewardship Plan will provide a comprehensive safe drug disposal stewardship program that will include compliant drug collection methods supported by outreach and education programs to increase resident awareness and participation. The Stewardship Plan will provide safe, secure, and convenient access on an ongoing basis for residents across the county and will be funded by participating Manufacturers. The Plan will also provide reporting on collection metrics and results of resident education and outreach campaigns.

II. Contact Information

✓ Ordinance 3635 Chapter 7.90.050(A)

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III. Collection System for all Unwanted Covered Drugs

- ✓ Ordinance 3635 Chapter 7.90.050(B)
- ✓ Ordinance 3635 Chapter 7.90.080

A. Reasonably Convenient and Equitable Access

- ✓ Ordinance 3635 Chapter 7.90.080(B)(1)
- ✓ Ordinance 3635 Chapter 7.90.080(B)(3)

Inmar will set up a collection system that provides convenient and equitable access to County Residents as outlined in the Ordinance § 7.90.080(B)(1). Drop-off sites are searchable to residents in Google Maps, simply by typing “Drug Disposal,” or other similar phrases in the Google Maps applications.

Pursuant to Ordinance § 7.90.080(B)(1), Inmar will establish a minimum of 25 drop-off sites throughout the County, geographically distributed to provide reasonably convenient and equitable access. As required by Ordinance § 7.90.080(B)(3), Inmar will give preference to locating drop-off sites at retail pharmacies and law enforcement agencies.

Inmar has engaged our existing pharmacy clients to become authorized collection sites. It is not our intention to duplicate kiosks that already exist in the County currently operated by other Plan Operators. Should volume demands indicate a need for additional kiosk capacity at location covered by Inmar or another Plan Operator, Inmar is willing to place additional kiosks adjacent to existing operating kiosks or supplement kiosk servicing frequency should the Department deem necessary. Inmar will work with other Plan Operators to coordinate kiosk locations and servicing needs to ensure safe and compliant kiosk operation. Appendix A-1 includes a list of locations that we have confirmed as kiosk drop-off sites. Appendix A-2 includes a list of potential locations that we continue to work on securing as kiosk drop-off sites.

Inmar will provide Mail-Back Services as an alternative method for meeting the convenience standard. In addition to the locations listed on Appendix A-3, primary target locations for Mail-Back Services will include doctor offices, medical clinics, dentists and veterinary offices.

B. Kiosk Collection

- ✓ Ordinance 3635 Chapter 7.90.050(B)
- ✓ Ordinance 3635 Chapter 7.90.080(C)

Inmar’s kiosk is made in the USA and designed to be safe and secure as required. Produced from 16-gauge cold-rolled steel, and with an easy-to-use, Americans with Disabilities Act (ADA)-compliant drop-box design, residents can easily drop unused medications through the drop door and into the shippable container and inner liner inside. The container is a 275 lb-rated box with a 6-mil, DEA-compliant liner. Liners are either 18 gallons or 35 gallons dependent upon geographical location and population density of the kiosk location. This volume rating is printed directly onto our 6-mil, DEA-compliant liners and has passed the tests prescribed in accordance with ASTM D 1922 and ASTM D 1709.

The kiosk design itself exceeds standard security requirements. The top of the kiosk is sloped, limiting the ability to stack items on top. In addition, the drop-slot features an extended metal drop door that lowers into the container to detect when product capacity is reached. When the drop door encounters resistance within the kiosk it is an indication that it is time to change the container. This manual capacity indicator eliminates the need to change batteries and/or sacrifice the location of the kiosk to be proximate to an electrical outlet. Lastly, the container access door is reversible to allow for convenient placement in any appropriate location in the pharmacy.

Per DEA requirements, the kiosk will be installed in the line of sight of pharmacy or DEA registrant employees and bolted to the floor or a permanent fixture. The Inmar kiosk has pre-drilled holes in the bottom for easier installation. It also features a 4-point locking system with steel projections in two center locations and the top and bottom of the door that are activated when locked for strengthened security. Top and bottom deadbolt locations are hidden from the outside to prevent break-ins.

If a Collector requests for the initial installation of the kiosk to be managed by Inmar, we will coordinate with the location and our contracted agency to install a kiosk at the location. The kiosk host is requested to remove any physical barriers of the identified kiosk location in advance of the agreed upon installation date and time as well as the location to be identified on the floor with markings such as tape to insure the kiosk is installed in the proper location. Some retail companies prefer to retain the liability within their corporation and prefer to complete the kiosk installations themselves with their own engineering teams. In this scenario, Inmar will outfit the locations with kiosks and the corporate technicians will arrange for all installation.

The Inmar kiosk will have signage that communicates what is and is not allowed to be placed inside. The signage will also feature the Plan website and toll-free phone number (detailed further in Section VII) so users of the program can ask questions and find more information. Kiosk signage will be designed for consistency with that of existing approved Plan Operators. See Appendix B for examples of signage.

Inmar's DEA and ADA-compliant kiosk is sent to the authorized Collector along with enough supplies for 3 returns. Supplies include:

- Pre-addressed, prepaid serialized container
- Serialized inner liners to protect against puncture and provide a liquid barrier
- Easy-to-use zip ties to seal inner liner compliantly
- Absorbent pad for placement in the bottom of the inner liner bag.

Pick-Up and Disposal

For the safe on-site removal of contents and servicing of kiosks, Inmar abides by the DEA regulations in 21 CFR 1300 et al.

Inmar will work with each authorized Collector to develop a collection program schedule that works specifically for their location, either an on-site or a self-service option.

Service technicians are available should emergency service be required. For a pickup request outside of the normal schedule, the standard response time is 48 hours. Regardless of the service model chosen, Inmar, with its contracted disposal partners, will provide direct feedback using discrepancy reports to prompt any corrective action needed should liners reach disposal facilities in a non-compliant manner, e.g., taped incorrectly, overweight, etc. Feedback is communicated directly to pharmacy locations as well as any technicians who may have assisted or serviced a return as described below. Any discrepancies will be included, as required, in the annual reports.

Self-Service Returns

Inmar will train authorized Collectors to service the kiosks on their own to allow for expedited servicing as desired. The steps to service a kiosk are fast, efficient, and DEA-compliant. Inmar will provide authorized Collectors with training materials including step-by-step instructions for tracking, sealing, shipping, and replacing collection containers. The process for the pharmacy once a kiosk is installed is as follows:

- Pharmacist receives the liner kit
- Pharmacy team (consisting of 2 pharmacy employees) constructs the container with inner liner, inserts and securely locks the kiosk
- Pharmacy team unlocks the kiosk drop door to enable consumer use
- Installation date of inner liner is documented and witnessed by 2 pharmacy employees on Tracking Sheet (included in Section V)
- Once kiosk is full, pharmacy team members will jointly open kiosk
- Container and inner liner is removed and documented on the Tracking Sheet
- Container is packaged (inner liner is zip tied, outer box is taped) to be compliant with all DOT Hazardous Materials Regulations
- The sealed inner liner will not be opened, x-rayed, analyzed, or otherwise penetrated.
- If the container must be shipped at a later time (shipment cannot take place at time of service), storage of the container behind pharmacy counter must be notated on the Tracking Sheet
- Replacement container and inner liner is constructed, inserted, secured into kiosk, documented and witnessed by 2 pharmacy employees on the Tracking Sheet
- Pharmacy team contacts FedEx for pickup of container for shipping to an authorized reverse distributor for destruction.

*At no point will the pharmacy have to store the filled container for longer than 48 hours after calling FedEx.

Technician-Assisted Returns

Inmar will provide contracted employees who will be trained specifically in servicing kiosks in a geographically-assigned area. These employees will establish a pattern for servicing the Collectors utilizing service metrics to establish an appropriate pattern of service. The service will include the following:

- Observation of the condition of the kiosk upon arrival
- Notification to the pharmacy employee of arrival
- Coordination of 2 pharmacy employees to witness change out of container and inner liner

- Removal, packaging, and documentation of the inner liner and container from the kiosk
- Replenishment of new supplies for renewed operation
- General clean-up and wipe down of kiosk
- Notation of inner liner serial number removed, and replacement inner liner serial number installed along with witness by 2 pharmacy employees
- Removal of full container to be stored in a secured, locked location in the pharmacy to await FedEx pick up
- Technician calls FedEx to schedule pickup of container unless otherwise agreed upon by pharmacy staff
- Final signature from pharmacy employees of completion of service event.

Regardless of the service model selected, Inmar has a long standing contractual relationship with FedEx and therefore has multiple internal and external contacts. Inmar's procurement and operations teams have direct relationships with personnel at FedEx corporate office. Should an issue arise with the standard 48 hour service level agreement, these contacts will be leveraged daily for mitigation of further issues as well as any needed general support. Detailed FedEx contact information can be found in Section IV.

Inmar will periodically monitor all container FedEx shipment tracking numbers from pharmacy locations to the designated reverse distributor as designated in Section IV.

Our training with both the retail pharmacy technicians and Inmar technicians include documentation which details the steps required to schedule FedEx pickups of the full containers. Inmar conveys this training both in written and oral format.

For locations where Inmar technicians aren't regularly servicing kiosks, Inmar has established several processes for issues to be mitigated. Aside from visual inspection when locking and unlocking the kiosk for use during pharmacy hours, pharmacy staff are provided with the following resources should they experience issues with the kiosk:

- Email the take-back@inmar.com inbox which is monitored by a large team of full time workers and issues can be quickly triaged and handled.

Inmar has a team of full time staff members dedicated to the program that will regularly visit kiosk locations to review and audit locations for program compliance.

Auto-Replenishment of Kiosk Supplies

Regardless of service option selected, the supplies used to collect and transport Unwanted Covered Drugs are provided in automatically-replenished "kits" of three. Each kit includes: pre-labeled and pre-paid cardboard box containers, liquid barriers, and serialized, puncture-resistant inner liners. The kit, when packaged with the interior components, is approximately 6 inches thick. The package is cinched tightly around the inner components, which makes for a very easy-to-store kit. Kits can be stored behind the pharmacy counter, behind a door, or under or behind a desk, with no ongoing maintenance required.

Upon receipt of the liner at our reverse distributor's site, an electronic raw data file via SSH File Transfer Protocol (SFTP) with the weight, serialized barcoded label information, and tracking information is passed to Inmar. This information is then received and entered into our Order Management log and Inbound Receipts log. The system tracks when the second of the three inner liners is received at the destruction partner. Inmar then initiates a reorder trigger for the next kit to be shipped. Auto replenishment reduces the amount of inventory maintained at the Collector while maintaining sufficient supplies to keep the kiosk continuously operable.

Figure 1: Kiosk Supply Auto-Replenishment Kit



C. Mail-Back Services

- ✓ Ordinance 3635 Chapter 7.90.050(B)
- ✓ Ordinance 3635 Chapter 7.90.080(B)(5)

As required by Ordinance § 7.90.080(B)(5), Inmar will provide prepaid and pre-addressed mailers, free of charge, to disabled and homebound County Residents. Standard Mail-back envelopes, Inhaler mail-back envelopes and Auto-Injector mail-back packages will also be available directly from Inmar via the existing approved Stewardship Plan Operator's program website and toll-free telephone number. Upon approval, Inmar is committed to working with other approved Stewardship Plan Operator(s) as required under Ordinance § 7.90.100(C) to determine a fair and equitable method of processing mail-back envelope returns.

Inmar will offer Mail-Back Services at multiple retail locations throughout the County. In locations where Inmar needs to offer Mail-Back Service locations to supplement the requirements for the convenience standard, our plan is simple and easily repeated. Unless otherwise requested by Collector kiosk locations, we will distribute mail-back envelopes only at locations that are non-kiosk locations.

County Residents will be able to request up to three (3) Standard mail-back envelope(s), Inhaler mail-back envelope(s) or Auto-Injector mail-back package(s) at a time via the Plan website or toll-free number. County Residents will receive the requested mailer no later than 10 business days from date of request.

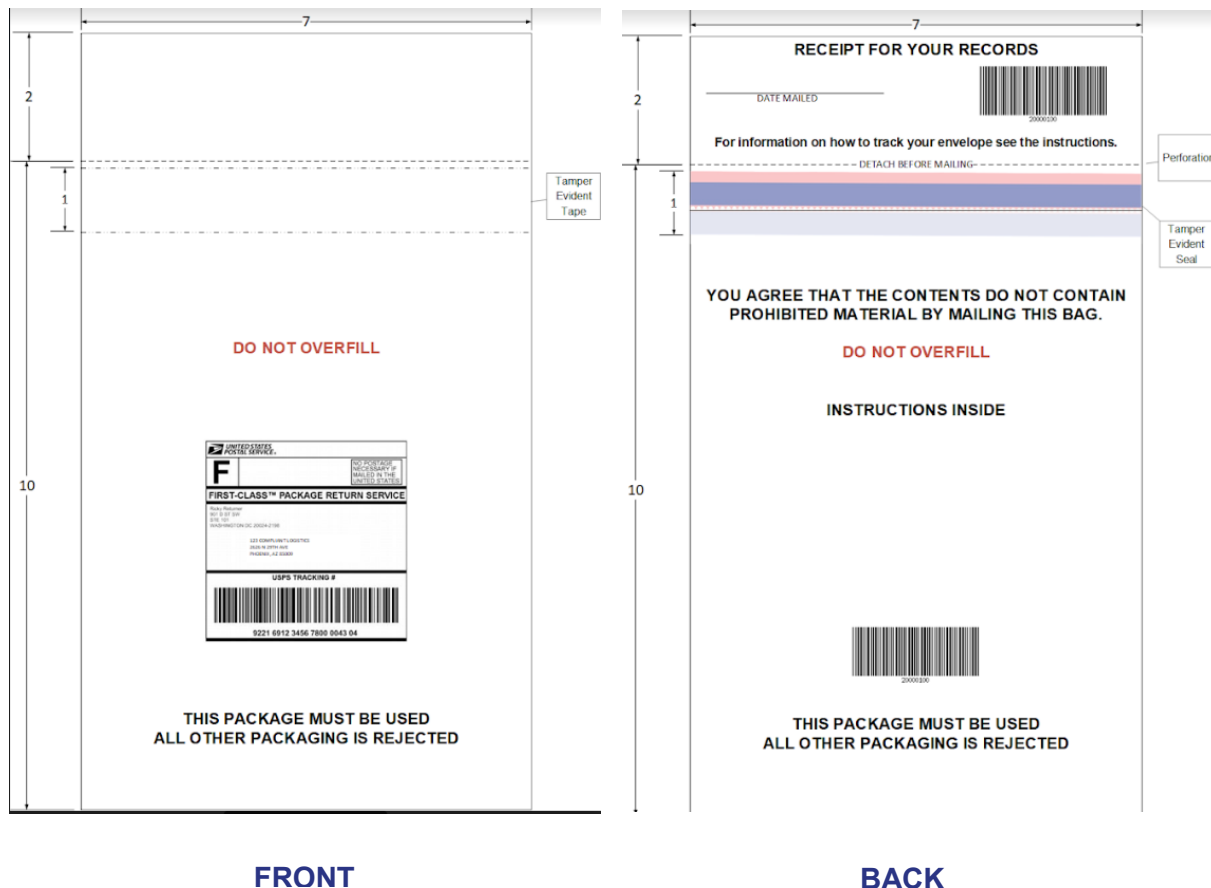
Both the Standard mail-back envelope and Inhaler mail-back envelope meet DEA rule requirements under § 1317.70(c):

- Preaddressed, postage paid
- Nondescript and do not indicate what may be inside
- Waterproof, tamper-evident, tear-resistant, and sealable
- Contain a unique ID number that allows for tracking
- Include instructions for the user that indicate the process for mailing the package, substances that can be sent, notice that packages can only be mailed in the US customs territory, and notice that the only packages provided by the authorized collector will be accepted
- No personally-identifiable information will be required.

Both Envelopes are white in color with a gray interior and are 7" x 10". The envelopes include a 3" perforated lip security seal. They are distributed by our third party contractor 123 Compliant Logistics, LLC.

A sample of each envelope is shown below:

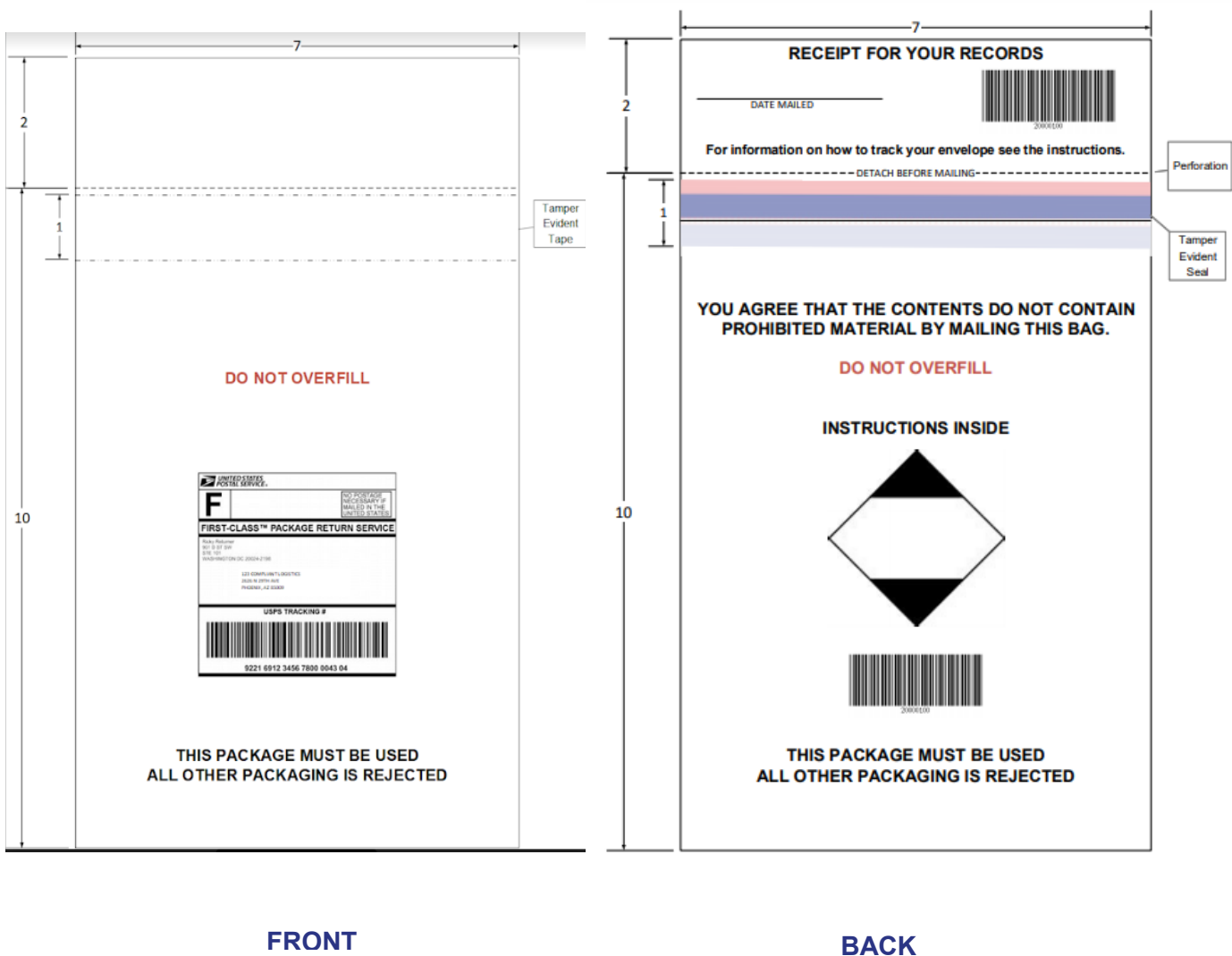
Figure 2: Sample Mail-Back Envelope



County Residents will be able to request three (3) Inhaler Mail-Back Envelope at a time via the program website or toll-free phone number. County Residents will receive the Inhaler Mail-Back Envelopes no later than 10 business days from date of request.

A sample Inhaler Mail-Back Envelope is shown below:

Figure 3: Sample Inhaler Mail-Back Envelope



Auto-Injector Mail-Back Packages

Residents will also be able request one (1) Auto-Injector Mail-Back Packages at a time via the program website or toll-free phone number. Residents will receive the Auto-Injector Mail-Back Packages no later than 10 business days from date of request. Auto-Injector Mail-Back Packages will meet all DOT requirements and will be fulfilled by 123 Compliant Logistics, LLC. See below for specifications and sample.

Specifications	
Access	Petals
Dimensions (in.)	7.5 x 3.6 x 3.6 in.
Color	Red
Lid Type	Hinge Cap
Liquid Absorbing Pad	Product has liquid absorbing pad
Universal Biohaz Sym	Product has universal biohaz symbol
Volume (L)	1.4 qt



D. Safety and Security

✓ Ordinance 3635 Chapter 7.90.080(B)(2)

Inmar provides significant training to our participating authorized Collectors and strictly follows the DEA guidelines for the proper handling of the drop-off site kiosks and inner liners. This begins with the proper training of the authorized Collector in the compliant operation of the kiosks and proper preparation, removal, and packaging of the container. It also involves the training of the Inmar staff that may come into contact with the full container to ensure proper handling. Inmar is very strict in our compliance to the DEA guideline as cited below.

Additional information on how Inmar manages documentation and tracking can be found in Section V. More detail on patient privacy practices is also provided in Section VI.

E. Participating Collectors and Drop-off Sites

✓ Ordinance 3635 Chapter 7.90.050(B)

✓ Ordinance 3635 Chapter 7.90.080(B)(3)(4)

✓ Ordinance 3635 Chapter 7.90.080(C)

Inmar is actively in discussions with its existing pharmaceutical returns client network seeking pharmacies interested in becoming authorized Collectors. Appendix A represents a list of potential participating Collectors and drop-off sites pursuant to those discussions. Inmar is in the process of engaging these pharmacies to become authorized Collectors. In compliance with Ordinance § 7.90.080(B)(4), Inmar gives preference to retail pharmacies and law enforcement agencies as Collectors and will ensure they are able to meet the requirements within three months of their offer to participate. All eligible validated retail, hospital, or clinic pharmacy locations not currently participating in an approved Stewardship Plan have been notified of Inmar's intent to become an approved Plan Operator. Pursuant to Ordinance § 7.90.080(C), Inmar will accept Covered Drugs from County Residents during all hours that the retail pharmacy, law enforcement agency, or other Collector is normally open for business.

It is not Inmar's intention to add additional kiosks to locations with existing collection bins serviced by current Plan Operators. However, in the unlikely event that more than one Stewardship Plan operates a drop-off site at a particular location, Inmar agrees that each drop-off site will accept all Covered Drugs. Should the Director determine that volume levels warrant additional kiosks or additional kiosks servicing frequency for kiosks operated by other Operators, Inmar remains willing to provide either option.

Inmar will review any potential Collector site against the California Board of Pharmacy License directory to validate that the location holds an active retail, hospital, or clinic license. Drop-off sites not operated by law enforcement will utilize secure kiosks for collection of Unwanted Covered Drugs. Additionally, sites will be required to provide evidence of current DEA registration. Inmar will notify the Director as new Collector drop-off sites become operational. Such notification will include the authorized Collector's contact information. Inmar will validate participating Collectors' California Board of Pharmacy License status and

DEA authorized Collector location status on an annual basis.

Inmar's utilizes its existing Field Account Representatives and Managers across the state to broadly and quickly reach out to independent and local hospital locations for notification and consideration regarding becoming a participating Collector under the Inmar Plan.

Inmar's utilizes its retail chain Sales and Leadership team relationships with existing retail corporate clients for notification and consideration regarding their County footprint locations becoming participating Collectors under the Inmar Plan.

Additionally, notification letters will be mailed to all validated, non-participating retail, hospital and clinic pharmacy locations, or corporate office contacts to ensure proper notification and awareness is achieved.

Written notifications as described above will be sent annually.

Inmar's goal is to meet the convenience standard so that at no time there shall be less than 25 drop-off sites collectively with the existing Plan Operator.

IV. Handling and Disposal

- ✓ Ordinance 3635 Chapter 7.90.050(C)
- ✓ Ordinance 3635 Chapter 7.90.090(A)(B)

Kiosk containers will be sent using Inmar's DOT Special Permit #20499, from the authorized Collector via FedEx to Inmar's third party contractor, 123 Compliant Logistics, LLC, a licensed DEA Reverse Distributor-Collector. All mailers will be sent via USPS to 123 Compliant Logistics. 123 Compliant Logistics will record the following information upon receipt of every individual kiosk container (including inner liner) and all mail-back envelopes and packages:

- Date received
- Serialized barcode label information
- FedEx Tracking information (kiosk containers only)
- Weight
- Date transported to disposal facility
- Disposal date
- Manifest number (if applicable).

All information recorded will be transferred back to Inmar on a daily basis as part of the electronic raw data file via SSH File Transfer Protocol (SFTP). Any discrepancies observed at 123 Compliant Logistics will be recorded on discrepancy reports to prompt any corrective action.

123 Compliant Logistics operates in full compliance with DEA § 1317.75(c) which prohibits handling substances after they have been deposited into a collection kiosk.

All Unwanted Covered Drugs shipped directly to 123 Compliant Logistics will be transported using their contracted, licensed hazardous waste transporter, TransChem Environmental to the appropriate disposal facility to be incinerated quickly, securely, efficiently, and in accordance

with all DEA requirements. 123 Compliant Logistics will be responsible for all DEA Form 41 record keeping requirements. Please refer to the table below for the contracted disposal locations.

In reference to Ordinance § 7.90.090(A)(B) “Stewardship Plans – Disposal of Unwanted Products”, 123 Compliant Logistics, TransChem Environmental and FedEx will comply with all local, state and federal laws and regulations surrounding the transportation and disposal of Unwanted Covered Drugs. Contact information and registration information is listed in the table below.

Company Name	Contact Information	Registration Information	Type of Incineration
123 Compliant Logistics, LLC 2626 N 29th Ave Phoenix, AZ 85009	Rory Buske 602-612-4140	DEA Reverse Distributor-Collector: R90571264	N/A
Clean Harbors Aragonite 11600N. Aptus Rd. Aragonite, UT94029	Michael Marlow 435-884-8100	EPA ID: UTD981552177	Hazardous Waste Incinerator- All Unwanted Covered Drugs
Clean Harbors El Dorado, LLC 309 American Circle El Dorado, AR 71730	Dan Roblee 870-863-7173	EPA ID: ARD069748192	Hazardous Waste Incinerator- All Unwanted Covered Drugs
Veolia ES Technical Solutions, L.L.C 7665 Highway 73 Port Aurthur, TX 77640	David Michaelis 281-216-9618	EPA ID: TXD000838896	Hazardous Waste Incinerator- All Unwanted Covered Drugs
TransChem Environmental 542 East 27 th Street Tuscon, AZ 85713	520-829-5651	DOT Registration: 052119550060B Hazardous Materials Safety Permit: US-1341480-AZ-HMSP	Hazardous Waste Transporter – All Unwanted Covered Drugs
FedEx	Eric Stillson 800-469-9993		Common Carrier – Kiosk Containers
USPS	Jackie Purcell 919-501-9394		Common Carrier – All Mail-Back Packages)

V. Policies and Procedures

✓ Ordinance 3635 Chapter 7.90.050(D)

Inmar operates drug collection kiosks across 46 States and the District of Columbia as part of its operations today and maintains compliance with all federal and state rules and laws. Upon approval to act as a Stewardship Organization, Inmar will ensure that it acts in compliance with all applicable laws, rules, and regulations as specified by the program requirements and require by contract where applicable that Vendors and drop-off sites are also compliant with all laws, regulations, and legal requirements.

Plan Operator (Inmar), Vendors and authorized Collectors will specifically be required to comply with The Controlled Substances Act, 21 USC § 801-971 and 21 CFR § 1317; United States Department of Transportation Hazardous Materials Regulation, 49 CFR parts 100-185; all applicable Marin County Rules and Regulations.

The DEA Rule defines authorized collectors as law enforcement agencies and additionally as retail pharmacies, reverse distributors, hospitals or clinics with onsite pharmacies and certain other entities that are registered with DEA as an authorized collector.

Inmar requires a signed agreement with retail locations ensuring their commitment to compliant operation of the collection kiosk and shipping of contents in compliance to the DEA regulations. A refusal to sign the agreement or comply with the DEA regulations would be a reason why a retailer could be excluded from the Plan.

Documentation and Tracking

Collection containers and inner liners will have a unique, serialized identification number to enable tracking at all stages of the return process illustrated below.



Shipment
from Inmar



Receipt at
Collection Site



Storage and Use at
Collection Site



Sealing and
Shipment from
Collection Site



Arrival and
Destruction at
Destruction Facility

Tracking is well documented as evidenced by the Inmar serialization tracking form which is referenced below. This form must be completed and witnessed by two authorized collection site employees.



DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM

Serialization Tracking Sheet should be validated by 2 pharmacy employees.

Name of Collecting Pharmacy		Address of Collecting Pharmacy		Collecting Pharmacy DEA #:	

SERIAL NUMBERS	Date Received by (1 Signatures)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)	Size of Liner	Address of Reverse Distributor/Disposal Site	Reverse Distributor/Disposal Site DEA #
Ex: 32587	4/26/19 John Jones	4/26/19 John Jones Sally Smith	5/26/19 John Jones Sally Smith	5/27/19 John Jones Sally Smith	Ex: 18 Gallon	1515 S Holt Road Indianapolis, IN 46241	Ex: 123456

The purpose of this form is to document the use of the serialized inner liner throughout the collection process and to help the authorized Collector meet record keeping requirements. Inmar will require each authorized Collector to understand and comply with all federal, state, and local regulatory requirements pertaining to collection of Covered Drugs applicable at the authorized Collector's registered location.

The serial numbers, date received, and signatures of the authorized pharmacy employees must be completed upon receipt of the container and inner liner. As illustrated above, the date-in-use is to be completed with authorized pharmacy employee signatures upon installation of the collection kiosk. The date the container and inner liner are removed from the kiosk is also to be noted with signatures. Finally, the date the container and inner liner are shipped is noted with authorized signatures. Once the container/inner liner arrives at the destruction facility, the serial number will be noted before final disposition. Authorized Collectors must maintain a copy of the completed form, and other records as applicable, on file at the authorized Collector's registered location for at least three years.

This tracking process will allow Inmar to report the number of collection site containers/inner liners distributed and returned in the annual reporting provided to Marin County, as required.

Transport

The Collector will properly seal, securely store, and arrange for pickup of the kiosk container (including inner liner) from the registered location in a manner consistent with DEA regulations. The container (including inner liner) will include a pre-addressed and prepaid shipping label. The FedEx representative will take possession of the container and deliver it to 123 Compliance Logistics for witnessed transportation to witnessed incineration. All mailers received at 123 Compliance Logistics will also be taken via witness transportation to witness transportation. Please refer to Section IV "Disposal" above for additional detail.

Disposal

Please refer to Section IV "Disposal" above for all detail regarding the policies and procedures for disposal of all Unwanted Covered Drugs.

VI. Patient Privacy

✓ Ordinance 3635 Chapter 7.90.050(E)

Inmar provides significant training to our participating authorized Collectors and strictly follows the DEA guidelines for the proper handling of the collection kiosks and inner liners. This begins with the proper training of the authorized Collector in the compliant operation of the kiosks and proper preparation, removal, and packaging of the container. It also involves the training of the Inmar staff that may come into contact with the full container to ensure proper handling. Inmar is very strict in our compliance to the DEA guideline as cited below.

According to the DEA - As provided in §§ 1317.60(c) and 1317.70(f), inner liners shall be sealed immediately upon removal from the permanent outer container; sealed inner liners and returned mail-back packages shall not be opened, x-rayed, analyzed, or otherwise penetrated. Accordingly, their contents shall not be sorted or inventoried subsequent to being placed into a collection receptacle or mail-back package. To clarify this, § 1317.75(c) was modified to add the prohibition against individually handling substances after they have been deposited into a collection receptacle.

Inmar has a long history of serving both commercial and government clients with program requirements that are as stringent as those required by the Ordinance. For example, Inmar's pharmacy applications manage Protected Healthcare Information (PHI) and are HIPAA-compliant. Additionally, as part of Inmar's Rx Returns (reverse distribution) business, we work very closely with regulators to implement compliant procedures covering the DEA, Board of Pharmacy, EPA, and other tangential regulatory entities. Data protection, privacy, and adherence to applicable regulations are the foundation of Inmar service capabilities.



Inmar has a long history of serving both commercial and government clients with stringent compliance standards such as the protection of Protected Health Information (PHI) and HIPAA.

VII. Public Education Effort and Promotion Strategy

✓ Ordinance 3635 Chapter 7.90.050(F)

✓ Ordinance 3635 Chapter 7.90.100

A. Promotion

✓ Ordinance 3635 Chapter 7.90.100(A)(1)

Inmar will execute a comprehensive and measurable public outreach strategy to drive awareness of the drug take-back program and maximize participation as required by Marin County Safe Drug Disposal Ordinance Chapter 7.90. In addition to preventative education, Inmar's strategy is designed to ensure that where and how to return Covered Drugs is widely understood by residents, pharmacists, retail pharmacies, health care facilities and providers, veterinarians, and veterinary hospitals.

A leader in the promotions space for nearly 40 years, Inmar has a unique set of core capabilities relative to other prospective program operators, specifically in consumer

marketing and activation. Thus, in addition to traditional outreach methods (signage, written materials, etc.), Inmar is able to drive participation among covered entities with modern, high-impact tactics such as influencer marketing and targeted media.

The individual components of Inmar's public outreach strategy are detailed below. Across all tactics, key messages will include, but not be limited to, the following:

- Encourage safe storage of drugs in the home (especially around children and teens)
- Dangers of drug misuse (i.e., not taking medicines as prescribed)
- Discourage improper disposal of drugs (e.g., flushing or solid waste collection)
- Arrival of a safe drug take-back solution with instructions for how to locate and participate
- Consumer Drug Take-Back Day promotion.

If more than one Stewardship Plan is approved by the Department, Inmar will seek to coordinate its promotional activities with other approved programs within 12 months after the other program is approved. Coordination efforts will include providing a single website and toll-free telephone number to access information about collection services for all approved Stewardship Plans.

B. Standardized Instructions

✓ Ordinance 3635 Chapter 7.90.100(A)(2)

Kiosk Signage

The collection kiosks themselves will be readily recognizable. The standard color for the kiosk is bright green for easy identification, and each kiosk is adorned with clear graphical instructions in both English and Spanish for proper use. Please see Appendix B for an image of the collection kiosk and disposal instructions.

C. Website and Toll-Free Number

✓ Ordinance 3635 Chapter 7.90.100(A)(3)

Website

The current County approved Plan Operator operates the website [Medproject.org](https://medproject.org). Inmar agrees to use the existing website in coordination with any other approved Plan Operator(s). Upon approval, Inmar is committed to working with any approved Stewardship Plan Operator(s) as required to determine a fair and equitable method in jointly meeting the requirements under the Ordinance.

Alternatively, Inmar is prepared to provide a mobile-optimized website, appropriately translated into languages required as designated by the County, which will publicize collection options and educate County Residents on proper disposal practices. Inmar will use enhanced search engine optimization to ensure easy location and access.

Specifically, the website will:

- Leverage Inmar's collaboration with Google Maps to allow County Residents to find the nearest Collector or mail-back sites via an interactive map. The list of locations will be updated monthly to ensure accuracy and will include the locations of kiosks placed by Inmar and other Plan Operators
- Allow residents to request prepaid return mailers
- Include educational and outreach materials promoting safe storage of drugs.

Toll-Free Number

The current County approved Plan Operator operates the toll-free number 844-633-7765. Inmar agrees to use the existing toll-free number in coordination with any other approved Plan Operator(s). Upon approval, Inmar is committed to working with any approved Stewardship Plan Operator(s) as required to determine a fair and equitable method in jointly meeting the requirements under the Ordinance.

Alternatively, Inmar is prepared to operate a multi-lingual, toll-free call center that County Residents can call to learn more about the Stewardship Plan, collection events, and drug disposal best practices. County Residents will also be able to request information about the nearest collection site or mail-back site and request that a prepaid mailer is sent to them. The call center is operated with live operators and will be staffed with a third party service to assist with live translation in the required languages. All operators are trained to assist and answer questions related to any and all questions regarding the Stewardship Plan operation including but not limited to authorized Collector kiosk support and service requests.

Outreach Materials

Inmar provides easily-consumable educational materials for dissemination to interested parties including County Residents, pharmacists, retailers, and health care practitioners upon request and at no charge.

These materials will:

- Provide instruction on how to safely store covered drugs at home
- Inform of the risks of disposing of covered drugs in inappropriate waste streams (e.g., solid waste collection, sewer, or septic systems)
- Outline how to participate in the drug take-back program for safe disposal of Covered Drugs.

All materials will be easily understandable by County Residents with varying levels of English proficiency and will leverage explanatory graphics to aid in comprehension.

Please see Appendix C for example materials.

Collector Marketing Support

To drive awareness and participation at a local level, Inmar will provide individual authorized Collectors with a variety of marketing assets at no charge, including in-store signage, social

media content kits, press release templates, a radio ad script, and scripts for pharmacy staff to let County Residents know that they can safely dispose of their Covered Drugs at that location. Authorized Collectors will be able to request additional marketing materials through the help desk.

Please see Appendix C for example materials.

Social Influencer Marketing

The 2016 acquisition of Collective Bias gave Inmar the ability to execute robust, data-driven social influencer marketing programs that activate shoppers and patients alike. On average, Inmar executes approximately 500 such programs annually.

Inmar has a curated network of more than 12,000 highly-vetted influencers who are experts at creating authentic, compelling content that can drive awareness and inspire participation among County Residents. Inmar utilizes sophisticated influencer selection, data-driven content distribution, and audience re-engagement tactics to ensure that content is hyper-relevant and that the County Residents receiving the content are the ones most inclined to take action.

Content can focus on an array of topical themes, however, based on the program requirements outlined in § 7.90.100 of the Ordinance, Inmar's recommendation would be one, or a combination of, the following:

- Tips for safe storage of medications in the home prior to disposal
- Education about the implications of improper drug disposal
- Promotion of the drug take-back program, including directions on where and how to participate.

Inmar executed a social influencer marketing program promoting drug take-back in April of 2019 which yielded exceptional results (see "Impact Measurement" below for more information on impact measurement and reporting). The campaign generated 11.4MM impressions, but, more importantly, the posts themselves were highly engaging. The average click-through-rate (CTR) was 4.5% (a historical CTR benchmark in this category is 1.5 - 2.0%) and users spent an average of one minute and eight seconds on each post. Both metrics suggests users found the content compelling and useful. Return on Investment (ROI) for social influencer marketing campaigns is measured in terms of return on Total Media Value (TMV) that is the combined value of earned and paid media for the campaign. In this case, TMV return was favorable at 2.1x.

Please see Appendix C for sample social influencer content. We also invite you to view some of the top performing posts linked below:

- [*Life in Check Consumer Drug Take-Back receptacle | National Prescription Drug Take-Back Day* by Meagan Harrell](#)
- [*5 Easy Tips to Declutter Your Closet + Safe Medication Disposal* by Valerie Clement](#)
- [*How to Dispose of Unused Medications Safely - Mom Always Knows* by Elizabeth Hurt](#)

Targeted Media

Inmar's expert paid media team actively monitors social influencer content for the highest performers - looking beyond vanity metrics to focus on deeper measurements such as views and engagements. The most engaging content is promoted across social platforms as well as off-site media to amplify the message around drug take-back to a targeted cohort of interested parties.

Lastly, in partnership with PlaceIQ, Inmar offers targeted ad units that allow messages to be delivered to County Residents that are physically near or in selected locations (e.g., near a collection kiosk) and provide after-action metrics, such as Place Visit Rate that demonstrates in-store foot traffic among your target audience.

Impact Measurement

In accordance with Ordinance § 7.90.100, Inmar will provide a description of outreach initiatives in its annual report, but also aims to provide more frequent and actionable reporting on the impact of such initiatives.

With specific regard to social influencer marketing and targeted media, Inmar's measurement tools and philosophies have continuously set the industry standard with their emphasis on transparency and quantifiability over vanity metrics and theoretical explanations.

All paid and organic activity is measured using the industry's most powerful analytics suite to capture true ROI. Reporting will include:

- Third-party verified Content View & Engagement reporting
- Engagement breakdown by social platform, including Time on Content
- Social Content Ad™ (aka social media ad) performance data
- Total Media Value (TMV) calculations
- Thumbnail links to all influencer content, and performance metrics for individual influencer posts (including TMV for each post).

D. Biennial Survey

✓ Ordinance 3635 Chapter 7.90.100(A)(4)

Inmar will conduct a biennial survey of Marin County Residents as well as pharmacists, veterinarians, and health professionals who interact with patients on use of medicines after the first full year of operation of the Stewardship Plan. The aim of the survey questions will be to measure the percent awareness of the Stewardship Plan, assess to what extent drop-off sites and other collection methods are convenient and easy to use, and assess knowledge and attitudes about risks of abuse, poisonings, and overdoses from prescription and non-prescription drugs used in the home.

Draft survey questions will be submitted to the Director for review and comment at least 30 days prior to the initiation of the survey. Results of the survey will be reported to the Director and made available to the public on the website required in § 7.90.100 within 90 calendar days of the end of the survey period. The privacy of all survey respondents shall be maintained.

E. Language Translation

✓ Ordinance 3635 Chapter 7.90.100(B)

All outreach methods will be translated into or conducted in languages specified by the Director and agreed by Inmar.

F. Multiple Stewardship Plans – Single System of Promotion

✓ Ordinance 3635 Chapter 7.90.100(C)

If more than one Plan is approved by the Department, at the direction of the Director and as the result of any meetings subject to the Ordinance, Inmar will coordinate its promotional activities with other approved Plan Operator(s). Inmar will coordinate to ensure that County Residents clearly understand the logistics, safety, and educational components of the Program. Inmar will coordinate educational outreach with other Plan Operators to ensure consistent messaging regarding the location of kiosks, safe disposal of medication, statistics regarding the dangers of pharmaceutical waste in the waste-stream, drug abuse statistics and other program advocacy, means of envelope distribution, and any other pertinent information related to the success of the program. This coordination will include the fair and equitable division of resources. Additionally, Inmar will coordinate with other Plan Operators to ensure consistent messaging among the types of educational outreach.

VIII. Goals

✓ Ordinance 3635 Chapter 7.90.050(G)

Program Collection Goals

Short-Term (2021)	Long-Term (2022+)
<ul style="list-style-type: none"> Initiate program operation Place 25 drop-off sites (5000 lbs.) Establish mail-back service and/or collection events in areas that are underserved by collection drop-off sites (3,000 lbs.) 	<ul style="list-style-type: none"> Increase drop-off site and mail-back site locations to provide convenient and equitable access as dictated by Ordinance § 7.90.080 (B)(1).

Program Education and Promotion Goals

Short-Term (2021)	Long-Term (2022+)
<ul style="list-style-type: none"> Phase 1 website functionality updates: <ul style="list-style-type: none"> Mail-back envelope requests Educational materials uploaded 	<ul style="list-style-type: none"> Phase 2 website functionality updates <ul style="list-style-type: none"> Collection site and mail-back envelope distribution site list updated (ongoing) Continue social influencer and targeted media outreach

<ul style="list-style-type: none"> ○ Collector kiosk maintenance resources and requests ○ Drop-off site and mail-back envelope distribution site list updated (ongoing) • Multi-lingual, toll-free call center launch • Initiate social influencer and targeted media outreach 	<ul style="list-style-type: none"> • Inmar will continue to monitor and optimize promotional initiatives as dictated by the metrics detailed under “Impact Measurement” in Section VII
--	---

IX. Additional Plan Considerations

✓ Ordinance 3635 Chapter 7.90.050(H)

Existing Providers of Pharmaceutical Waste Services

To the extent that existing providers of pharmaceutical waste services are already in operation, Inmar will determine if coordinating efforts creates efficiencies for the County and improves convenient and equitable access for County Residents.

Furthermore, to the extent that there are other Stewardship Organizations, Inmar will seek to coordinate its activities with said programs within 12 months after Inmar’s Stewardship Plan is approved. Consumer Drug Take-Back website will ensure that all County Residents can easily identify, understand, and access the collection services provided by Inmar and other Stewardship Organizations. Coordination efforts will include providing a single website and toll-free telephone number to access information about collection services for all approved programs.

Package Separation & Recycling

DEA § 1317.75(c) prohibits handling substances after they have been deposited into a collection kiosk. For this reason, Inmar is unable to recycle drug packaging or separate Covered Drugs from packings. However, Inmar can execute educational programs, as outlined in Section VII, to encourage County Residents to separate Unwanted Covered Drugs from their packaging and recycle the packaging prior to disposal.

Even though regulations prevent us from recycling drug packaging, Inmar still has a vested interest in reducing waste and improving our environment. Through our Rx Returns and related business lines Inmar has saved over 20,000 barrels of oil, recovered over 11,000 megawatts of clean energy, and powered over 900 homes in just the past two years alone. We will continue to look for opportunities to expand our eco-friendly efforts in Marin County.



Inmar Energy Metrics

Megawatts of Clean Energy Recovered:

2017 = 5,436
2018 = 5,643

Barrels of Oil Saved:

2017 = 9,896
2018 = 10,270

Homes Powered for a Year:

2017 = 482
2018 = 495

X. Reporting Requirements

✓ Ordinance 3635 Chapter 7.90.110(A)(C)

Drug Collection Annual Reporting

Inmar will submit an annual report in accordance with Marin County Safe Drug Disposal Ordinance § 7.90.110 that will include:

1. List of participating Producers in the Stewardship Program
2. Amount by weight of Covered Drugs collected, including the amount by weight from each collection method used
3. List of names and locations of drop-off sites
4. Number of mailers provided for disabled and/or home-bound county residents
5. Locations of mail-back envelope distribution sites
6. List of collection events including dates and locations
7. List of transporters and disposal facilities
8. Description of any safety or security problems occurring during collection, transportation, or disposal of Unwanted Covered Drugs during the reporting period. In response to any safety or security problems, the Stewardship Organization will show the changes implemented to alleviate any future problems and how it improved safety and security
9. Description of the public education, outreach, and evaluation activities implemented during the reporting period
10. Description of how collected packaging was recycled to the extent feasible, including the recycling facility or facilities used
11. Summary of the Stewardship Plan's goals, the degree of success in meeting those goals in the past year, and if any goals have not been met, what effort will be made to achieve the goals in the next reporting period
12. Summary of total expenditures of the Stewardship Plan during the reporting period

Timing of the report will be by January 1st after the first full year of implementation ending December 31st, and each January 1st thereafter.

Education and Outreach Initiatives

In accordance with the Ordinance § 7.90.110, Inmar will provide a description of outreach initiatives in its annual report, but also aims to provide more frequent and actionable reporting on the impact of such initiatives.

With specific regard to social influencer marketing and targeted media, Inmar's measurement tools and philosophies have continuously set the industry standard with their emphasis on transparency and quantifiability over vanity metrics and theoretical explanations. All paid and organic activity is measured using the industry's most powerful analytics suite to capture true ROI. Reporting will include:

- Third-party verified Content View & Engagement reporting
- Engagement breakdown by social platform, including Time on Content
- Social Content Ad™ (aka social media ad) performance data
- Total Media Value (TMV) calculations

Thumbnail links to all influencer content, and performance metrics for individual influencer posts (including TMV for each post).

APPENDIX

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Appendix A-1: Confirmed Drop-off Sites

Store Name	Store Address	Store City	Store Zip	Status
LUCKY PHARMACY #720	570 MAGNOLIA AVE	LARKSPUR	94939	Confirmed
SAFEWAY PHARMACY #2718	800 REDWOOD HWY FRONTAGE RD. STE 110	MILL VALLEY	94941	Confirmed
SAFEWAY PHARMACY #2828	5720 NAVE DRIVE	NOVATO	94949	Confirmed

Appendix A-2: Potential Drop-off Sites

Store Name	Store Address	Store City	Store Zip	Status
KAISER PERMANENTE PHARMACY #398	820 LAS GALLINAS	SAN RAFAEL	94903	In Discussion
DBA: COSTCO PHARMACY #141	300 VINTAGE WAY	NOVATO	94945	In Discussion
RITE AID #5959	431 CORTE MADERA TOWN CENTER	CORTE MADERA	94925	Notified
RITE AID #5961	701 EAST BLITHEDALE AVE.	MILL VALLEY	94941	Notified
DBA: WALGREENS # 04559	227 SHORELINE HWY	MILL VALLEY	94941	Notified
PHARMACA INTEGRATIVE PHARMACY	230 EAST BLITHEDALE	MILL VALLEY	94941	Notified
CVS PHARMACY # 16212	200 VINTAGE WAY	NOVATO	94945	Notified
PHARMACA INTEGRATIVE PHARMACY	7514 REDWOOD BLVD	NOVATO	94945	Notified
RITE AID #5963	910 DIABLO AVENUE	NOVATO	94947	Notified
GOLDEN GATE PHARMACY	8 DIGITAL DR STE 200	NOVATO	94949	Notified
DBA: WALGREENS # 07445	820 SIR FRANCIS DRAKE BLVD	SAN ANSELMO	94960	Notified
CVS PHARMACY # 17629	125 SHORELINE PKWY	SAN RAFAEL	94901	Notified
RITE AID #5957	471 3RD STREET	SAN RAFAEL	94901	Notified
DBA: WALGREENS #13584	155 NORTHGATE ONE	SAN RAFAEL	94903	Notified
RITE AID #5958	1500 NORTHGATE MALL	SAN RAFAEL	94903	Notified
CVS/PHARMACY # 17694	180 DONAHUE STREET	SAUSALITO	94965	Notified

Appendix A-3: Mail-Back Sites

Site Name	Site Address	Site City	Site Zip	Status
SAFEWAY PHARMACY #0788	1 CAMINO ALTO	MILL VALLEY	94941	Mail Back Confirmed
SAFEWAY PHARMACY #0932	350 NORTHGATE ONE	SAN RAFAEL	94903	Mail Back Confirmed
Marin Health Medical Center	250 Bon Air Rd	Greenbrae	94904	Mail Back Target
Novato Community Hospital	180 Rowland Way	Novato	94945	Mail Back Target
Kentfield Hospital	1125 Sir Francis Drake Blvd	Kentfield	94904	Mail Back Target
Kaiser Permanente San Rafael Medical Center	99 Montecillo Rd	San Rafael	94903	Mail Back Target
Larkspur Clinic: UCSF Benioff Children's Hospital Oakland	1100 Larkspur Landing Cir	Larkspur	94939	Mail Back Target
Marin Treatment Center, Inc.	1466 Lincoln Ave	San Rafael	94901	Mail Back Target
Marin Health Foundation	100B Drakes Landing Rd # 255	Greenbrae	94904	Mail Back Target
Pediatric Neurology: Sutter Pacific Medical Foundation: Greenbrae	1100 S Eliseo Dr #1st	Greenbrae	94904	Mail Back Target
Marin Community Healthcare	1 H St, San Rafael	San Rafael	94901	Mail Back Target
Serenity Knolls	145 Tamal Rd	Forest Knolls	94933	Mail Back Target
Marin County Dept. of Health & Human Services	1682 Novato Blvd	Novato	94947	Mail Back Target
Coastal Health Alliance	3 6th St Ste 21	Point Reyes Station	94956	Mail Back Target
Coastal Health Alliance	3 6th St	Point Reyes Station	94956	Mail Back Target
Coastal Health Alliance	7 Wharf Rd	Bolinas	94924	Mail Back Target
Coastal Health Alliance	3419 State Route 1	Stinson Beach	94970	Mail Back Target
University of California, San Diego	100 Main St	San Quentin	94964	Mail Back Target
Marin Community Clinic	411 4th St	San Rafael	94901	Mail Back Target
Marin Community Clinic	411 4th St	San Rafael	94901	Mail Back Target
Marin Community Clinic	5 Bon Air Rd	San Rafael	94901	Mail Back Target
Marin Medical Practice Concepts	1100 S Eliseo Dr	Greenbrae	94904	Mail Back Target

Marin Medical Practice Concepts	1101 S Eliseo Dr	Greenbrae	94904	Mail Back Target
Falck USA	17 Woodland Dr	San Rafael	94901	Mail Back Target
Global Procurement Solutions	435 Murray Circle	Sausalito	94965	Mail Back Target
Center Point, Inc.	603 D St & 207 1st St	San Rafael	94901	Mail Back Target
CDCR - San Quentin State Prison	San Quentin State Prison	San Quentin	94964	Mail Back Target
Bradly Jacobs, MD	601 Murray Cir	Sausalito	94965	Mail Back Target
Marin City Health and Wellness	601 2nd St	San Rafael	94901	Mail Back Target
Ethos Veterinary Health	901 San Francisco Blvd E	San Rafael	94901	Mail Back Target
Cheri Joy Forrester, MD	3 Harbor Dr	Greenbrae	94904	Mail Back Target
MGH Education	5 Bon Air Rd	Greenbrae	94904	Mail Back Target
MGH Radiation Oncology	1350 S Eliseo Dr	Greenbrae	94904	Mail Back Target
Tamalpais Internal Medicine	23 Reed Blvd	Greenbrae	94904	Mail Back Target
Marin Health OB/GYN & Urogynecology	100 A Drakes Landing	Greenbrae	94904	Mail Back Target
North Bay Regional Surgery Center	100 Rowland Way Ste 145	Novato	94945	Mail Back Target
North Bay Regional Surgery Center	100 Rowland Way Ste 145	Novato	94945	Mail Back Target
Walgreens Drug 07445	820 Sir Francis Drake Rd	San Anselmo	94960	Mail Back Target
Walgreens Drug 04559	227 Shoreline Hwy	Mill Valley	94941	Mail Back Target
Walgreens Drug 04625	830 3Rd St	San Rafael	94901	Mail Back Target
Marin Advanced Imaging Center	1260 S Eliseo Dr Ste 101	Greenbrae	94904	Mail Back Target
Center Point Inc	135 Paul Dr	San Rafael	94903	Mail Back Target
Parnell, Diana	1030 Sir Francis Drake Blvd Ste 110	Kentfield	94904	Mail Back Target
Tanasovich, Cheryl	1300 S Eliseo 207	Greenbrae	94904	Mail Back Target
Frederickson, Kim	400 Professional Ctr Dr Ste414	Novato	94947	Mail Back Target
Marin City Health & Wellness Cent	630 Drake Ave	Sausalito	94965	Mail Back Target
Biomarin Pharm Inc	21 Pimental Ct	Novato	94949	Mail Back Target

Appendix B: Kiosk Signage

MEDICINE DISPOSAL

Eliminación de medicamentos

药物处置

Pagtatapon ng gamot

Контейнер для утилизации медикаментов



ACCEPTED

MEDICATIONS IN ANY DOSAGE FORM, EXCEPT FOR THOSE LISTED BELOW, IN THEIR ORIGINAL CONTAINER OR SEALED BAG.



NOT ACCEPTED

HERBAL REMEDIES, VITAMINS, SUPPLEMENTS, COSMETICS, OTHER PERSONAL CARE PRODUCTS, MEDICAL DEVICES, BATTERIES, MERCURY-CONTAINING THERMOMETERS, SHARPS, AND ILLICIT-DRUGS.

Name: 123 Pharmacy
Contact: (555) 555-5555

SAFELY DISPOSE OF UNWANTED & EXPIRED MEDICINES

**01**

Cross out or remove personal identifying information from the medicine bottle.



OR

**02**

Leave the product in its original container or place solid medicines in a sealed plastic bag.*

*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.

**03**

Put medicine in the kiosk.

ONLY SCHEDULE II-V CONTROLLED AND NON-CONTROLLED SUBSTANCES THAT ARE LAWFULLY POSSESSED BY THE ULTIMATE USER ARE ACCEPTABLE TO BE PLACED IN THE KIOSK. SCHEDULE I CONTROLLED SUBSTANCES, ILLICIT OR DANGEROUS SUBSTANCES, AND ANY CONTROLLED SUBSTANCES NOT LAWFULLY POSSESSED BY THE ULTIMATE USER MAY NOT BE PLACED IN THE KIOSK.

**INMAR.**
intelligence

For more information about the drug disposal program,
please go to **www.med-project.org** or call **1-844-633-7765**.

Appendix C: Promotion Material

1. Sample Education Materials

WHAT SHOULD YOU DO WITH YOUR **UNWANTED** OR **EXPIRED** MEDICINES?

There are a number of ways to dispose of expired or unwanted medications.

Medicines help treat diseases, manage chronic conditions, and improve health and well-being for millions of Americans. It's vitally important that patients take their medicine as prescribed by their health care provider and as indicated on the label or packaging. It's also important to be sure to store medications securely to prevent accidental ingestion or misuse by others in your household, especially children.

If you have expired or unwanted medication, proper disposal is easy. To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the following disposal options.

(Source: U.S. Food and Drug Administration)



For more information about the program, go to www.med-project.org or call 1-844-633-7765



This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of Inmar Intelligence or the Producers participating in the Inmar Intelligence Product Stewardship Plan.

SAFELY DISPOSE OF UNWANTED & EXPIRED MEDICINES

WHAT SHOULD YOU DO WITH YOUR
EXPIRED OR UNWANTED MEDICINES?



CHECK THE
PACKAGE



MAIL-BACK



CONVENIENT
LOCATIONS



TAKE-BACK
EVENTS



DISPOSAL OPTIONS



1 CHECK THE PACKAGE

If there are specific instructions for disposal on the label, package or package insert, please follow those instructions.



2 CONVENIENT LOCATIONS

To find the drop-off sites in your area, visit the Convenient Locations section of www.med-project.org. Mail-Back Distribution Locations may also be available in your area.

To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the disposal options listed above.



3 MAIL-BACK

Mail-Back Services for Unwanted Medicines, Pre-filled Injector Products, and Inhalers may be available. Visit the Mail-Back section of www.med-project.org to order a Mail-Back Package.



4 TAKE-BACK EVENTS

Local Take-Back events offer residents a free and convenient way to dispose of expired or Unwanted Medicines. Visit the Take-Back Events section of www.med-project.org for information on events in your area.

WHAT ITEMS CAN I DISPOSE OF AT A KIOSK?



ACCEPTED:

Medications in any dosage form, except for those listed below, in their original container or sealed.*

*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.



NOT ACCEPTED:

Herbal remedies, vitamin, supplements, cosmetics, other personal care products, medical devices, batteries, mercury-containing thermometers, sharp, and illicit drugs.

2. Sample Mail-Back Materials

MAIL-BACK PACKAGE IS FOR **UNWANTED OR EXPIRED MEDICATIONS**



ACCEPTED

Medications in any dosage form, except those listed below, in their original container or sealed bag.*

*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.

NOT ACCEPTED

Herbal remedies, vitamins, supplements, cosmetics, other personal care products, inhalers, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the disposal options listed above.

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of Inmar Intelligence or the Producers participating in the Inmar Intelligence Product Stewardship Plan.

INMAR
intelligenceLIFE IN CHECK™
CONSUMER DRUG TAKE-BACK

DISPOSAL OPTIONS:

01

CHECK THE PACKAGE

If there are specific instructions for disposal on the label, package or package insert, please follow those instructions.

03

MAIL-BACK

Mail-back Services for Unwanted Medicines, Pre-filled Injector Products, and Inhalers may be available. Visit the Mail-Back section of www.med-project.org to order a mail-back package.

02

CONVENIENT LOCATIONS

To find the drop-off sites in your area, visit the Convenient Locations section of www.med-project.org. Mail-Back Distribution Locations may also be available in your area.

04

TAKE-BACK EVENTS

Local Take-Back Events offer residents a free and convenient way to dispose of expired or Unwanted Medicines. Visit the Take-Back Events Section of www.med-project.org for information on events in your area.

For more information about the Inmar Intelligence program, please go to www.med-project.org or call 1-844-633-7765.

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of Inmar Intelligence or the Producers participating in the Inmar Intelligence Product Stewardship Plan.

MAIL-BACK PACKAGE IS FOR PRE-LOADED PRODUCTS CONTAINING A SHARP AND AUTO-INJECTORS



ACCEPTED

Pre-loaded products containing a sharp and auto-injectors.

NOT ACCEPTED

Unwanted medicines that are not pre-loaded products containing a sharp or auto-injectors, inhalers, herbal remedies, vitamins, supplements, cosmetics, other personal care products, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

Note: Injector Mail-Back Packages can only be used for pre-filled injector products and cannot accept other types of items.

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of Inmar Intelligence or the Producers participating in the Inmar Intelligence Product Stewardship Plan.



DISPOSAL OPTIONS:

01

CHECK THE PACKAGE

If there are specific instructions for disposal on the label, package or package insert, please follow those instructions.

03

MAIL-BACK

Mail-back Services for Unwanted Medicines, Pre-filled Injector Products, and Inhalers may be available. Visit the Mail-Back section of www.med-project.org to order a mail-back package.

02

CONVENIENT LOCATIONS

To find the drop-off sites in your area, visit the Convenient Locations section of www.med-project.org. Mail-Back Distribution Locations may also be available in your area.

04

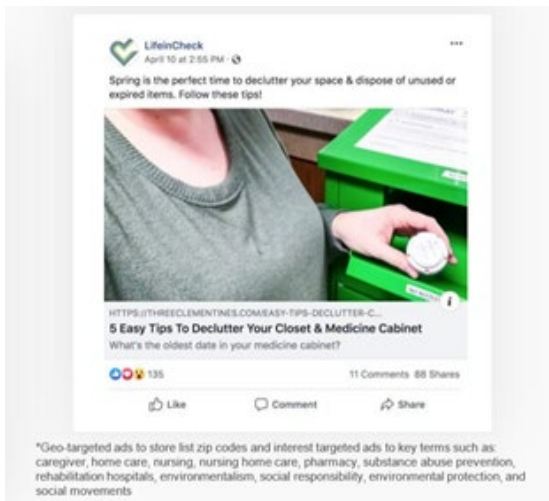
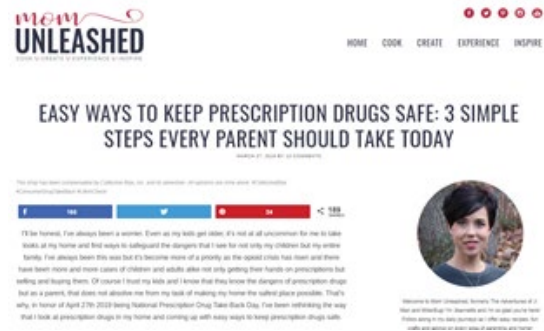
TAKE-BACK EVENTS

Local Take-Back Events offer residents a free and convenient way to dispose of expired or Unwanted Medicines. Visit the Take-Back Events Section of www.med-project.org for information on events in your area.

For more information about the Inmar Intelligence program, please go to www.med-project.org or call 1-844-633-7765.

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3. Sample Social Influencer Content



Appendix D: Applicable Permits and Licenses

The following permits have been provided on the following pages:

1. DEA – 123 Compliance

DEA REGISTRATION NUMBER	THIS REGISTRATION EXPIRES	FEE PAID
R90571364	04-30-2021	\$1523
SCHEDULES	BUSINESS ACTIVITY	ISSUE DATE
1,2,2N, 3,3N,4,5	REVERSE DISTRIB-COLLECTOR	01-31-2020
123 COMPLIANT LOGISTICS, LLC 2626 N 29TH AVE PHOENIX, AZ 850091602		

CONTROLLED SUBSTANCE REGISTRATION CERTIFICATE
UNITED STATES DEPARTMENT OF JUSTICE
DRUG ENFORCEMENT ADMINISTRATION
WASHINGTON D.C. 20537

Sections 304 and 1008 (21 USC 824 and 958) of the Controlled Substances Act of 1970, as amended, provide that the Attorney General may revoke or suspend a registration to manufacture, distribute, dispense, import or export a controlled substance.

THIS CERTIFICATE IS NOT TRANSFERABLE ON CHANGE OF OWNERSHIP, CONTROL, LOCATION, OR BUSINESS ACTIVITY, AND IT IS NOT VALID AFTER THE EXPIRATION DATE.

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DEA REGISTRATION NUMBER	THIS REGISTRATION EXPIRES	FEE PAID
R90571364	04-30-2021	\$1523
SCHEDULES	BUSINESS ACTIVITY	ISSUE DATE
1,2,2N, 3,3N,4,5	REVERSE DISTRIB-COLLECTOR	01-31-2020
123 COMPLIANT LOGISTICS, LLC 2626 N 29TH AVE PHOENIX, AZ 850091602		

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THANK YOU.

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